

EXHIBIT B

From: [Levy, Max I.](#)
To: [Rohit Nath](#)
Cc: [Alter-AI-TT@simplelists.susmangodfrey.com](#); [Geman, Rachel](#); [openaicopyrightlitigation.lwteam@lw.com](#); [OpenAICopyright](#)
Subject: RE: [Authors Guild, Alter] Follow Up re Meet and Confer
Date: Wednesday, April 17, 2024 9:55:54 PM

EXTERNAL Email

Hi Rohit,

Thanks for reaching out. We are actively working on pulling together OpenAI's supplemental responses to your discovery requests and are aiming to provide them for all those that we agreed to supplement next week.

Additionally, we can confirm that we will provide proposed search terms and custodians on that same timeline, if not sooner. We will provide availability for a meet and confer regarding search terms and custodians when we provide the proposal.

Best,
Max

MAX LEVY

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